

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

LUCILLE HALL,

**Plaintiff,**

**V.**

**GENPAK, L.L.C.,**

**Defendant.**

**CIVIL ACTION NO.  
2:06 CV 946-MHT (WO)**

**DEFENDANT GENPAK'S MOTION TO  
EXTEND DISPOSITIVE MOTION DEADLINE**

Comes now Defendant Genpak, LLC. (“Genpak” or “Defendant”) and respectfully requests that this Honorable Court extend the dispositive motion deadline in this matter by thirty (30) days. In support of this motion, Defendant states the following:

1. Currently, the dispositive motion deadline is scheduled for December 13, 2007.
2. Faced with Plaintiff's<sup>1</sup> challenging schedule and the Thanksgiving holidays, the parties agreed to conduct Plaintiff's deposition on Saturday, December 1, 2007. Plaintiff's deposition was held on that day. The parties have not yet received the deposition transcript from the court reporter, but have asked for an expedited turn-around.
3. In the week following Plaintiff's deposition, the parties have engaged in confidential conversations regarding the resolution of this matter in lieu of further litigation. The parties are still engaged in these discussions and need additional time to fully explore the possibilities of resolving this matter independently or through alternative dispute resolution.

<sup>1</sup> Plaintiff Lucille Hall is proceeding *pro se* in this matter.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Honorable Court extend the dispositive motion deadline for thirty (30) days, thus setting the new dispositive motion deadline as January 12, 2007.

Respectfully submitted,

/s/ Robin A. Adams

David M. Smith

Robin A. Adams

Attorneys for Defendant Genpak, L.L.C.

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of December, 2007, a copy of the foregoing was served via certified first-class mail, postage prepaid, to:

Ms. Lucille Hall

6124 Fuller Rd

Montgomery Al 36110

/s/ Robin A. Adams

OF COUNSEL